

JS 44 (Rev. 11/04)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

UMG RECORDINGS, INC.; BMG MUSIC; ARISTA RECORDS LLC; and CAPITOL RECORDS, LLC

(b) County of Residence of First Listed Plaintiff Los Angeles County, CA
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANT**JOHN DOE**

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)

Geoffrey L. Beauchamp (No. 40380) Telephone: (267) 781-0615
Geoffrey L. Beauchamp, P.C. Facsimile: (215) 706-0895
1015 York Road
Willow Grove, PA 19090
E-mail: GLBLaw@comcast.net

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

(For Diversity Cases Only)

- | | PTF | DEF | PTF | DEF |
|---|----------------------------|----------------------------|---|---|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury—Med. Malpractice <input type="checkbox"/> 365 Personal Injury—Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities- Employment <input type="checkbox"/> 446 Amer. w/Disabilities-Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations & Disclosure Act <input type="checkbox"/> 730 Labor/Mgmt. Reporting <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW 405(g) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions

V. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

Transferred from

Appeal to

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity)

17 U.S.C. § 501 et seq.Brief description of the cause: copyright infringement**VII. REQUESTED IN COMPLAINT**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

Statutory damages; injunction

CHECK YES only if demanded in complaint

JURY DEMAND:

☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions)

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

July 2, 2008

s/ Geoffrey L. Beauchamp

40380

FOR OFFICE USE ONLY

RECEIPT# _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA – DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: See Attachment A
 Address of Defendant: unknown
 Place of Accident, Incident or Transaction: The acts of infringement complained of herein occurred in this judicial district
(Use Reverse Side for Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
 (Attach two copies of the Disclosure Statement Form in accordance with Fed. R.Civ. P. 7.1(a)) Yes ☒ No ☐

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes ☐ No ☒

Civil (Place ☒ in ONE CATEGORY ONLY):

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Notice Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
 (Please specify) Copyright

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability -- Asbestos
9. ☐ All other Diversity Cases
 (Please specify)

ARBITRATION CERTIFICATION

(check appropriate Category)

I, Geoffrey L. Beauchamp, counsel of record do hereby certify:

- ☒ Pursuant to Local Civil Rule Issue 53.2, Section 3 (c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☒ Relief other than monetary damages is sought.

DATE: July 2, 2008

s/ Geoffrey L. Beauchamp
 Attorney-at-Law

40380
 Attorney I.D.

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: July 2, 2008

s/ Geoffrey L. Beauchamp

40380

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ATTACHMENT A

UMG Recordings, Inc.
2220 Colorado Avenue
Santa Monica, CA 90404
County of Los Angeles

BMG Music
1540 Broadway
New York, NY 10036
County of New York

Arista Records LLC
888 Seventh Avenue, 40th Floor
New York, NY 10019
County of New York

Capitol Records, LLC
150 Fifth Avenue, 11th Floor
New York, NY 10011
County of New York

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

UMG RECORDINGS, INC., a Delaware corporation; BMG MUSIC, a New York general partnership; ARISTA RECORDS LLC, a Delaware limited liability company; and CAPITOL RECORDS, LLC, a Delaware limited liability company,	:	
	:	CIVIL ACTION NO.
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JOHN DOE,	:	
	:	
Defendant.	:	

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 THROUGH §2255 ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying a plaintiff Social Security Benefits ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos ()
- (e) Special Management – cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()

(f) Standard Management – Cases that do not fall into any one of the other tracks.

(x)

July 2, 2008

Date

s/ Geoffrey L. Beauchamp

Attorney-at-Law

Attorney for Plaintiffs

(267) 781-0615

Telephone

(215) 706-0895

FAX Number

GLBLaw@comcast.net

E-Mail Address

(Civ. 660) 10/02

**Civil Justice Expense and Delay Reduction Plan
Section 1:03 – Assignment to a Management Track**

1. a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
2. b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
3. c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
4. d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
5. e) Nothing in this Plan is intended to supersede Local Civil Rules 40.1 and 72.1, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.
- 6.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS
(See §1.02(e) Management Track Definitions of the
Civil Justice Expense and Delay Reduction Plan)**

Special Management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

UMG RECORDINGS, INC., a Delaware corporation; BMG MUSIC, a New York general partnership; ARISTA RECORDS LLC, a Delaware limited liability company; and CAPITOL RECORDS, LLC, a Delaware limited liability company,	:	CIVIL ACTION NO.
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JOHN DOE,	:	
	:	
Defendant.	:	

DISCLOSURE STATEMENT FORM

Please check one box:

- ~ The nongovernmental corporate party, _____, in the above listed civil action does not have any parent corporation and publicly held corporation that owns 10% or more of its stock.
- ☒ The nongovernmental corporate parties, all Plaintiffs, in the above listed civil action have the following parent corporation(s) and publicly held corporation(s) that owns 10% or more of its stock:

See Attachment A

July 2, 2008	s/ Geoffrey L. Beauchamp
_____	_____
Date	Signature

Counsel for: PLAINTIFFS

Federal Rule of Civil Procedure 7.1 Disclosure Statement

(a) WHO MUST FILE NONGOVERNMENTAL CORPORATE PARTY: A nongovernmental corporate party to an action or proceeding in a district court must file two copies of a statement that identifies any parent corporation and any publicly held corporation that owns 10% or more of its stock or states that there is no such corporation.

(b) TIME FOR FILING; SUPPLEMENTAL FILING. A party must:

- (1) file the Rule 7.1(a) statement with its first appearance, pleading, petition, motion, response or other request addressed to the court, and
- (2) promptly file a supplemental statement upon any change in the information that the statement requires.

DISCLOSURE STATEMENT FORM

ATTACHMENT A

Pursuant to Federal Rule of Civil Procedure 7.1, Plaintiffs identify below persons, associations of persons, firms, partnerships, corporations, guarantors, insurers, affiliates, parent and subsidiary corporations, or other legal entities that are financially interested in the outcome of the case, as well as all publicly held corporations that own 10% or more of any Plaintiff's stock.

Plaintiff UMG RECORDINGS, INC.'s ultimate parent corporation is Vivendi S.A., a publicly held French company.

Plaintiff BMG MUSIC is a general partnership owned by SONY BMG MUSIC ENTERTAINMENT and Ariola Eurodisc LLC, neither of which is publicly traded.

Plaintiff ARISTA RECORDS LLC is a limited liability company owned by BMG Music, a New York general partnership, which is not publicly traded.

Plaintiff CAPITOL RECORDS, LLC's ultimate parent is Maltby Capital Limited, which is not publicly traded.

Dated: July 2, 2008

By: s/ Geoffrey L. Beauchamp
Geoffrey L. Beauchamp, Esq. (No. 40380)
Geoffrey L. Beauchamp, P.C.
1015 York Road
Willow Grove, PA 19090
Telephone: (267) 781-0615
Facsimile: (215) 706-0895
E-mail: GLBLaw@comcast.net
Attorneys for Plaintiffs

States, including this one. In addition, Defendant contracted with an Internet Service Provider (“ISP”) found in this District to provide Defendant with the access to the Internet which facilitated Defendant’s infringing activities.

PARTIES

4. Plaintiff UMG Recordings, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of California.

5. Plaintiff BMG Music is a general partnership duly organized and existing under the laws of the State of New York, with its principal place of business in the State of New York.

6. Plaintiff Arista Records LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

7. Plaintiff Capitol Records, LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

8. The true name and capacity of Defendant are unknown to Plaintiffs at this time. Defendant is known to Plaintiffs only by the Internet Protocol (“IP”) address assigned to Defendant by his or her ISP on the date and time of Defendant’s infringing activity. See Exhibit A. Plaintiffs believe that information obtained in discovery will lead to the identification of Defendant’s true name.

COUNT I INFRINGEMENT OF COPYRIGHTS

9. Plaintiffs incorporate herein by this reference each and every allegation contained in each paragraph above.

10. Plaintiffs are, and at all relevant times have been, the copyright owners or licensees of exclusive rights under United States copyright law with respect to certain copyrighted sound recordings, including, but not limited to, all of the copyrighted sound recordings on Exhibit A to this Complaint (collectively, these copyrighted sound recordings shall be identified as the "Copyrighted Recordings"). Each of the Copyrighted Recordings is the subject of a valid Certificate of Copyright Registration issued by the Register of Copyrights to each Plaintiff as specified on each page of Exhibit A.

11. Among the exclusive rights granted to each Plaintiff under the Copyright Act are the exclusive rights to reproduce the Copyrighted Recordings and to distribute the Copyrighted Recordings to the public.

12. Plaintiffs are informed and believe that Defendant, without the permission or consent of Plaintiffs, has continuously used, and continues to use, an online media distribution system to download and/or distribute to the public certain of the Copyrighted Recordings. Exhibit A identifies the IP address with the date and time of capture and a list of copyrighted recordings that Defendant has, without the permission or consent of Plaintiffs, downloaded and/or distributed to the public. Through his or her continuous and ongoing acts of downloading and/or distributing to the public the Copyrighted Recordings, Defendant has violated Plaintiffs' exclusive rights of reproduction and distribution. Defendant's actions constitute infringement of Plaintiffs' copyrights and/or exclusive rights under copyright. (In addition to the sound recordings listed on Exhibit A, Plaintiffs are informed and believe Defendant has, without the permission or consent of Plaintiffs, continuously downloaded and/or distributed to the public additional sound recordings owned by or exclusively licensed to Plaintiffs or Plaintiffs' affiliate

record labels, and Plaintiffs believe that such acts of infringement are ongoing. Exhibit A includes the currently-known total number of audio files being distributed by Defendant.)

13. Plaintiffs have placed proper notices of copyright pursuant to 17 U.S.C. § 401 on each respective album cover of each of the sound recordings identified in Exhibit A. These notices of copyright appeared on published copies of each of the sound recordings identified in Exhibit A. These published copies were widely available, and each of the published copies of the sound recordings identified in Exhibit A was accessible by Defendant.

14. Plaintiffs are informed and believe that the foregoing acts of infringement have been willful, intentional, and in disregard of and with indifference to the rights of Plaintiffs.

15. As a result of Defendant's infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to statutory damages pursuant to 17 U.S.C. § 504(c) against Defendant for each infringement of each copyrighted recording. Plaintiffs further are entitled to their attorneys' fees and costs pursuant to 17 U.S.C. § 505.

16. The conduct of Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot fully be compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiffs are entitled to injunctive relief prohibiting Defendant from further infringing Plaintiffs' copyrights, and ordering that Defendant destroy all copies of copyrighted sound recordings made in violation of Plaintiffs' exclusive rights.

WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

1. For an injunction providing:

"Defendant shall be and hereby is enjoined from directly or indirectly infringing Plaintiffs' rights under federal or state law in the Copyrighted Recordings and any sound recording, whether now

in existence or later created, that is owned or controlled by Plaintiffs (or any parent, subsidiary, or affiliate record label of Plaintiffs) ("Plaintiffs' Recordings"), including without limitation by using the Internet or any online media distribution system to reproduce (*i.e.*, download) any of Plaintiffs' Recordings or to distribute (*i.e.*, upload) any of Plaintiffs' Recordings, except pursuant to a lawful license or with the express authority of Plaintiffs. Defendant also shall destroy all copies of Plaintiffs' Recordings that Defendant has downloaded onto any computer hard drive or server without Plaintiffs' authorization and shall destroy all copies of those downloaded recordings transferred onto any physical medium or device in Defendant's possession, custody, or control."

2. For statutory damages for each infringement of each Copyrighted Recording pursuant to 17 U.S.C. § 504.

3. For Plaintiffs' costs in this action.

4. For Plaintiffs' reasonable attorneys' fees incurred herein.

5. For such other and further relief as the Court may deem just and proper.

Dated: July 2, 2008


By:  s/ Geoffrey L. Beauchamp
Geoffrey L. Beauchamp, Esq. (No. 40380)
Geoffrey L. Beauchamp, P.C.
1015 York Road
Willow Grove, PA 19090
Telephone: (267) 781-0615
Facsimile: (215) 706-0895
E-mail: GLBLaw@comcast.net
Attorneys for Plaintiffs

EXHIBIT A**JOHN DOE****IP Address:** 165.123.210.227 2007-11-03 13:23:22 EDT**CASE ID#** 146851888**P2P Network:** Gnutella**Total Audio Files:** 171

<u>Copyright Owner</u>	<u>Artist</u>	<u>Recording Title</u>	<u>Album Title</u>	<u>SR#</u>
UMG Recordings, Inc.	The Pussycat Dolls	Buttons	PCD	377-102
BMG Music	Christina Aguilera	The Voice Within	Stripped	326-219
UMG Recordings, Inc.	Nelly Furtado	No Hay Igual	Loose	387-509
Arista Records LLC	Whitney Houston	Could I Have This Kiss Forever	Whitney The Greatest Hits	284-891
Capitol Records, LLC	OK Go	C-C-C-Cinnamon Lips	Ok Go	322-969
UMG Recordings, Inc.	Rihanna	If It's Lovin' That You Want	If It's Lovin' That You Want (single)	377-878
UMG Recordings, Inc.	Nelly Furtado	Promiscuous	Promiscuous (single)	391-618
UMG Recordings, Inc.	Shaggy	Angel	Angel (single)	299-251
UMG Recordings, Inc.	Rihanna	SOS	A Girl Like Me	387-137
UMG Recordings, Inc.	Shania Twain	From This Moment On	Come On Over	243-502

AO 121 (6/90)

TO: Register of Copyrights Copyright Office Library of Congress Washington, D.C. 20559	REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT
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In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION ~ APPEAL		COURT NAME AND LOCATION United States District Court Eastern District of Pennsylvania United States Courthouse 601 Market Street Philadelphia, PA 19106-1797
DOCKET NO.	DATE FILED	
PLAINTIFF UMG RECORDINGS, INC.; BMG MUSIC; ARISTA RECORDS LLC; and CAPITOL RECORDS, LLC		DEFENDANT JOHN DOE
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK
1	See Exhibit A, attached.	
2		
3		
4		
5		

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY			
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill	<input type="checkbox"/> Other Pleading
COPYRIGHT REGISTRATION NO.	TITLE OF WORK		AUTHOR OF WORK	
1				
2				
3				

In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached:

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgment		WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No	DATE RENDERED
CLERK	(BY) DEPUTY CLERK		DATE

*U.S.G.P.O. 1982-374-279

Copy 1 – Upon initiation of action, mail this copy to Register of Copyrights.

EXHIBIT A**JOHN DOE****IP Address:** 165.123.210.227 2007-11-03 13:23:22 EDT**CASE ID#** 146851888**P2P Network:** Gnutella**Total Audio Files:** 171

<u>Copyright Owner</u>	<u>Artist</u>	<u>Recording Title</u>	<u>Album Title</u>	<u>SR#</u>
UMG Recordings, Inc.	The Pussycat Dolls	Buttons	PCD	377-102
BMG Music	Christina Aguilera	The Voice Within	Stripped	326-219
UMG Recordings, Inc.	Nelly Furtado	No Hay Igual	Loose	387-509
Arista Records LLC	Whitney Houston	Could I Have This Kiss Forever	Whitney The Greatest Hits	284-891
Capitol Records, LLC	OK Go	C-C-C-Cinnamon Lips	Ok Go	322-969
UMG Recordings, Inc.	Rihanna	If It's Lovin' That You Want	If It's Lovin' That You Want (single)	377-878
UMG Recordings, Inc.	Nelly Furtado	Promiscuous	Promiscuous (single)	391-618
UMG Recordings, Inc.	Shaggy	Angel	Angel (single)	299-251
UMG Recordings, Inc.	Rihanna	SOS	A Girl Like Me	387-137
UMG Recordings, Inc.	Shania Twain	From This Moment On	Come On Over	243-502

AO 121 (6/90)

TO: Register of Copyrights Copyright Office Library of Congress Washington, D.C. 20559	REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT
---	---

In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION ~ APPEAL		COURT NAME AND LOCATION United States District Court Eastern District of Pennsylvania United States Courthouse 601 Market Street Philadelphia, PA 19106-1797
DOCKET NO.	DATE FILED	
PLAINTIFF UMG RECORDINGS, INC.; BMG MUSIC; ARISTA RECORDS LLC; and CAPITOL RECORDS, LLC		DEFENDANT JOHN DOE
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK
1	<u>See Exhibit A</u> , attached.	
2		
3		
4		
5		

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY			
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill	<input type="checkbox"/> Other Pleading
COPYRIGHT REGISTRATION NO.	TITLE OF WORK		AUTHOR OF WORK	
1				
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In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached:

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgment	WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No	DATE RENDERED
CLERK	(BY) DEPUTY CLERK	DATE

*U.S.G.P.O. 1982-374-279

Copy 2 – Upon filing of document adding copyright(s), mail this copy to Register of Copyrights.

EXHIBIT A**JOHN DOE****IP Address:** 165.123.210.227 2007-11-03 13:23:22 EDT**CASE ID#** 146851888**P2P Network:** Gnutella**Total Audio Files:** 171

<u>Copyright Owner</u>	<u>Artist</u>	<u>Recording Title</u>	<u>Album Title</u>	<u>SR#</u>
UMG Recordings, Inc.	The Pussycat Dolls	Buttons	PCD	377-102
BMG Music	Christina Aguilera	The Voice Within	Stripped	326-219
UMG Recordings, Inc.	Nelly Furtado	No Hay Igual	Loose	387-509
Arista Records LLC	Whitney Houston	Could I Have This Kiss Forever	Whitney The Greatest Hits	284-891
Capitol Records, LLC	OK Go	C-C-C-Cinnamon Lips	Ok Go	322-969
UMG Recordings, Inc.	Rihanna	If It's Lovin' That You Want	If It's Lovin' That You Want (single)	377-878
UMG Recordings, Inc.	Nelly Furtado	Promiscuous	Promiscuous (single)	391-618
UMG Recordings, Inc.	Shaggy	Angel	Angel (single)	299-251
UMG Recordings, Inc.	Rihanna	SOS	A Girl Like Me	387-137
UMG Recordings, Inc.	Shania Twain	From This Moment On	Come On Over	243-502

AO 121 (6/90)

TO: Register of Copyrights Copyright Office Library of Congress Washington, D.C. 20559	REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT
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In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION ~ APPEAL		COURT NAME AND LOCATION United States District Court Eastern District of Pennsylvania United States Courthouse 601 Market Street Philadelphia, PA 19106-1797
DOCKET NO.	DATE FILED	
PLAINTIFF UMG RECORDINGS, INC.; BMG MUSIC; ARISTA RECORDS LLC; and CAPITOL RECORDS, LLC		DEFENDANT JOHN DOE
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK
1	<u>See Exhibit A, attached.</u>	
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In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY			
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill	<input type="checkbox"/> Other Pleading
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CLERK	(BY) DEPUTY CLERK	DATE

*U.S.G.P.O. 1982-374-279

Copy 3 – Upon termination of action, mail this copy to Register of Copyrights.

EXHIBIT A**JOHN DOE****IP Address:** 165.123.210.227 2007-11-03 13:23:22 EDT**CASE ID#** 146851888**P2P Network:** Gnutella**Total Audio Files:** 171

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UMG Recordings, Inc.	Nelly Furtado	No Hay Igual	Loose	387-509
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UMG Recordings, Inc.	Rihanna	If It's Lovin' That You Want	If It's Lovin' That You Want (single)	377-878
UMG Recordings, Inc.	Nelly Furtado	Promiscuous	Promiscuous (single)	391-618
UMG Recordings, Inc.	Shaggy	Angel	Angel (single)	299-251
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AO 121 (6/90)

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CLERK	(BY) DEPUTY CLERK	DATE

*U.S.G.P.O. 1982-374-279

Copy 4 – In the event of an appeal, forward this copy to the Appellate Court so they can prepare a new AO 279 for the appeal.

EXHIBIT A**JOHN DOE****IP Address:** 165.123.210.227 2007-11-03 13:23:22 EDT**CASE ID#** 146851888**P2P Network:** Gnutella**Total Audio Files:** 171

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*U.S.G.P.O. 1982-374-279

Copy 5 – Case file copy.

EXHIBIT A**JOHN DOE****IP Address:** 165.123.210.227 2007-11-03 13:23:22 EDT**CASE ID#** 146851888**P2P Network:** Gnutella**Total Audio Files:** 171

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